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JUN 13 2008

**Environmental
Cleanup Office**

900 S.W. Fifth Avenue, Suite 2600
Portland, Oregon 97204
main 503.224.3380
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JUN 13 2008

**Environmental
Cleanup Office**

AARON C. COURTNEY
Direct (503) 294-9411
accourtney@stoel.com

June 12, 2008

VIA U.S. MAIL

United States Environmental Protection Agency, Region 10
Ms Claire Hong, Remedial Project Manager
Environmental Cleanup Office, ECL-111
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

**Re: Request for Information - Lower Duwamish Waterway Superfund Site: Longview
Fibre Company (Longview Fibre Paper & Packaging, Inc.)**

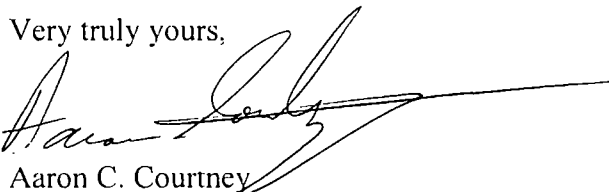
Dear Ms Hong:

On behalf of my client, Longview Fibre Paper & Packaging, Inc ("LFPPI") (formerly Longview Fibre Company), I am submitting the attached written response, together with associated responsive documentation, as requested in the United States Environmental Protection Agency's ("EPA") Request for Information pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act for the Lower Duwamish Waterway Superfund Site, Seattle, Washington.

In accordance with my recent conversation with EPA Counsel on the matter of insurance documentation, LFPPI has submitted the most recent insurance policies, and to the best of their knowledge, a list of the relevant historic policies. As discussed, this is due to the volume of policy documentation and the cumbersome nature of copying it in full in the requisite timeframe. LFPPI will provide copies of historical policies, if EPA so requests, after reviewing the enclosed response.

Please feel free to give me a call if you have any questions.

Very truly yours,



Aaron C. Courtney

Enclosures

Portland-2410600.1 0046481-00021



Oregon
Washington
California
Utah
Idaho

RESPONSES TO US EPA CERCLA SECTION 104(e) INFORMATION REQUEST

Respondent: Representative of Longview Fibre Company
c/o Corporation Service Company.

Site: Lower Duwamish Waterway, Seattle WA
Longview Fibre Company
6701 East Marginal Way S
Seattle, WA 98108

King County Parcels: 5367204080
1924049091

Date: 1950 to present

INFORMATION REQUEST QUESTIONS

1. Respondent Information

- a. *Provide the full legal name and mailing address of the Respondent.*

Longview Fibre Paper and Packaging, Inc.
P.O. Box 639
300 Fibre Way
Longview, WA 98632

- b. *For each person answering these questions on behalf of Respondent, provide:*

- i. *full name;*
- ii. *title;*
- iii. *business address; and*
- iv. *business telephone number and FAX machine number.*

Alan D. Whitford, Environmental Services Manager
P.O. Box 639
300 Fibre Way
Longview, WA 98632
Phone (360) 575-5576 FAX (360) 575-6110

and

Larry Brill, General Manager
Seattle Container Plant
PO Box 24867
5901 E. Marginal Way S.
Seattle, WA 98134
Phone (206) 762-7170; FAX (206) 767-2442

c If Respondent wishes to designate an individual for all future correspondence concerning this Site, please indicate here by providing that individual's name, address, telephone number, and fax number.

Alan D. Whitford
PO Box 639
300 Fibre Way
Longview, WA 98632
Phone (360) 575-5576; FAX (360) 575-6110

d State the dates during which Respondent held any property interests at or within one-half mile of the above mentioned address.

5901 East Marginal Way, Seattle, WA ("Containerboard Facility Property"). Owned by Longview Fibre Paper and Packaging, Inc. ("LFPPI"), and its predecessor company, Longview Fibre Company ("LFCo"), since 1953.

6705 East Marginal Way, Seattle—a portion of Building A within what is commonly referred to as the Seattle Distribution Center ("Warehouse Property"). Leased by LFPPI (originally through LFCo) since May 2004. Note, LFPPI is one of many tenants in this industrial park managed by a common landlord, and the correct address for this property is 6705, not 6701 as per the EPA information request.

(Together referred to as the "Properties.")

e State the dates during which Respondent conducted any business activity at or within one-half mile of the above mentioned address.

LFPPI currently owns the Containerboard Facility Property and leases the Warehouse Property. It has leased the Warehouse Property for four years and conducts business activities at both sites.

f. Describe the nature of Respondent's business activities at the above mentioned address or within one-half mile of that address.

Containerboard Facility Property: Corrugated fiber container manufacturing.

The Containerboard Facility Property is located at 5901 East Marginal Way South, in Seattle, Washington 98134. In addition, the leased Warehouse Property is an important part of the box plant operation, and is located near the intersection of Highland Park Way and 2nd Avenue SW, approximately ½ mile south of the Containerboard Facility Property. The Containerboard Facility Property is situated on approximately 3.6 acres of property owned by LFPPI that sits near the Duwamish Waterway in a heavily industrialized area of the Duwamish Valley. The plant manufactures corrugated boxes from corrugated sheets made at this location. Historically, it has also manufactured solid fiber containers. All operations are located in one building complex of approximately 130,000 square

feet. The Containerboard Facility Property was constructed and began operating in 1954, and has undergone several equipment upgrades and modifications at various times since then. Presently, the employment base consists of approximately 90 production, administrative and management employees. The capacity of the plant is approximately 80 million square feet of corrugated product per month. *See* Response 2(d) for a more detailed description of operations at this site.

Warehouse Property: There is no manufacturing, assembly or packaging activity at this location. Its uses are limited to storage and distribution of finished corrugated materials specific to LFPPI's business. The warehouse, operated on a day to day basis for LFPPI by a contractor (PNW Trucking), is less than one-half mile south of the Containerboard Facility Property and consists of approximately 10,000 square feet of floor space for temporary storage and shipping of container products from the Containerboard Facility Property. Stacks of finished boxes are stored on pallets and then loaded into trucks for delivery to the customer. There are no environmentally-significant features associated with the facilities or operation of the warehouse, however, environmental compliance responsibility for all warehouse operations is assigned to, and under the direction of the Seattle container plant management.

g *In relation to your answer to the previous question, identify all materials used or created by your activities at the above mentioned address, including raw materials, commercial products, building debris, and other wastes.*

Containerboard Facility Property:

Fixed Storage

- One 10,000 gallon waste water storage tank
- One 5,000 gallon waste water treatment tank
- One 3,000 gallon treated water storage tank
- One 5,000 gallon diesel oil storage tank (AGT), stand by fuel
- One 150 gallon starch preparation tank
- Two 300 gallon starch holding tanks
- One 4,000 gallon bulk caustic storage tank
- One 225,000 pound dry starch silo
- Twelve 65 gallon ink base storage tanks
- Seven 55 gallon recycle ink storage tanks
- Twenty-six 40 pound propane fuel tanks

The fixed storage is either inside the building or secured so that it cannot be tampered with.

Other Storage

Ten 55 gallon drums of oils used for lubrication

Five gallon can of regular gasoline

Three 55 gallon drums of boiler water treatment chemicals

Wastes Produced

Filter cake from the wastewater treatment system (Beckert)

Trim waste (paper) from the process

Plastic drums and buckets

Broken pallets

Recycled oils

Recycled solvents

Solid wastes are sent to the Columbia Ridge landfill in Arlington, Oregon.

Waste Management of Seattle picks up general garbage.

Used oil and solvents are recycled by Emerald Petroleum Services of Seattle.

See also the products manufactured at this site and wastes related thereto as detailed below in Responses 2(d), (e) and (g).

Warehouse Property:

Overhead lighting (fluorescent bulbs); fax machine and telephone; PC and monitor; one Hyster forklift utilizing petroleum-based lubricants as recommended by manufacturer; three 40 pound compressed gas cylinders of propane; finished paper and corrugated materials.

h. If Respondent, its parent corporation, subsidiaries or other related or associated companies have filed for bankruptcy, provide:

- i. the U. S. Bankruptcy Court in which the petition was filed;*
- ii. the docket numbers of such petition;*
- iii. the date the bankruptcy petition was filed;*
- iv. whether the petition is under Chapter 7 (liquidation), Chapter 11 (reorganization), or other provision; and*
- v. a brief description of the current status of the petition.*

Not applicable.

2. Site Activities and Interests

a. Provide all documents in your possession regarding the ownership or environmental conditions of the property mentioned above, including, but not limited to, copies of deeds, sales contracts, leases, blueprints, "as-builts" and photographs.

Copies of ownership/leasehold documentation in the LFPPI's possession regarding the Properties are provided herewith, including deeds, leases, and sales contracts.

Copies of documents in the LFPPI's possession regarding environmental conditions at the Containerboard Facility Property are provided herewith. *See also* documents and responses provided in response to questions 2(b), 2(e), 2(g), 2(h) and 2(i) (relating to environmental conditions of the Properties).

See Document numbers LFC000001 – LFC001166 and LFC003466 - LFC003519bl.

b. Provide information on the condition of the property when purchased; describe the source, volume, and content of any fill material used during the construction of the buildings, including waterside structures such as seawalls, wharves, docks, or marine ways.

Documentation regarding the condition of the Containerboard Facility Property when purchased in 1955 and immediately following this date is provided herewith. *See* Document numbers LFC001167-LFC001180. LFPPI knows no further details on the source and volume of fill material other than that provided in the attached documentation in known by the Respondent.

The Containerboard Facility Property is not adjacent to any waterway and thus there are no waterside structures.

c. Provide information on past dredging or future planned dredging at this site.

LFPPI has not conducted any dredging nor is planning to conduct any dredging at the Properties.

d. Provide a brief summary of the activities conducted at the site while under Respondent's - ownership or operation. Include process diagrams or flow charts of the industrial activities conducted at the site.

Containerboard Facility Property: A 130,000-square-foot plant occupies the site and produces corrugated boxes and displays. An office area in the northwestern corner of the building is mainly used for sales, managerial, and clerical/administrative activities.

Rolled sheets of paper stock, including liner board and corrugating medium are delivered via truck to the Containerboard Facility Property as raw materials from the main LFPPI manufacturing facility in Longview, Washington, and from several other suppliers (such as Weyerhaeuser and Smurfit-Stone). Propane-powered clamp trucks pick up the rolls of paper stock and store them in the warehouse area in the northeastern and western portion of the building until they are needed at the corrugator. Propane for the forklifts is stored in a rack in a 1,000-gallon tank on the north side of the building.

The process of making corrugated boxes begins in the corrugator using three or more pieces of paper (containerboard). The outer surfaces are linerboard and the inner, fluted paper is called "medium." A sheet of paper which will become the corrugated medium is softened with steam, then fed through a machine called a "single-facer." The medium passes between two large metal rolls with teeth, which give it wavy ridges, or "flutes." Starch adhesive is applied to the fluted medium, which is then sandwiched between two flat sheets of paper (linerboard). The combined, 3-layer board passes through curing section in a continuous web, and then is scored, cut into proper sized blanks (sheets), and stacked.

The paper layers are combined using a mixture of starch, water, caustic soda, borax, and a water resistant resin that are mixed in the "Starch Kitchen," on the southeast side of the building. The Starch Kitchen utilizes a 4,200-gallon caustic aboveground tank, 0-65-gallon tote containing borax, three approximately 300-gallon ASTs containing mixed starch for delivery to the corrugators, a water tank, a starch powder silo (located outside), and piping to treat, combine, prepare, and store the starch mixture.

Starch is delivered in powder form to the Container Plant Property and stored in a 25,000-gallon AST outside the production area. The blended starch mixture is pumped via overhead piping to the corrugator, where it is used as an adhesive in combining the sheets. After combining, the sheets are sent through a heat press to cure the starch. The cured sheets, called "blanks," are then sent through the cutting portion of the corrugators, which cuts the blanks to the desired size. The blanks then are sent to the corrugated board storage area. Movement of products throughout the facility is mostly accomplished using electric powered floor trucks set on rails and powered and unpowered conveyers.

To manufacture a new box, the corrugated sheets are passed through machines that print, score, die cut and fold the sheets. The side seam of the box (manufacturer's joint) is fastened by gluing, taping or stitching. The finished flat boxes are gathered into bundles and stacked, then shipped to the box customer's plant, or placed in a warehouse.

The finished goods and processing area are used to print, die cut, fold, and glue the boxes to customer specifications. The facility employs six flexographic ink printers for box printing. All inks used are water-based. Some inks are used directly as supplied; however, the majority of colors must be mixed to customer specification in the "Ink Kitchen." Near the Ink Kitchen is a bucket washer that is utilized to wash buckets for reuse in mixing inks. Wash water from the bucket washer is directed to an onsite wastewater treatment system. The inks and some glues are applied to the boxes on the printing equipment plate press. The printing plates used for the individual boxes are manufactured to customer specifications by various suppliers and purchased by LFPPI or are produced by LFPPI's customers. After the boxes are printed they are die cut and sent to the bander finisher for packaging and delivery.

Water, provided by the City of Seattle, is piped throughout the facility for use in various production processes. Specifically, the water is used for starch mixing, steam production, and printing press cleaning. Sanitary wastewater generated throughout the building is discharged directly to the City of Seattle sanitary sewer main. The water used to clean up the machines goes to a water treatment system within the facility before it is recycled back into the process or discharged to the city's wastewater treatment system.

Trimming from the die cutting and corrugated sheet cutting process are collected in a vacuum system and sent to a bailer. The trimmings are shipped via truck or for recycling at the LFPPI paper mill in Longview, Washington.

For a process diagram/flowchart *see* Document numbers LFC001181-LFC001182.

Warehouse Property: *See* Responses 1(f) and (g).

e. Provide all documents pertaining to sale, transfer, delivery, disposal, of any hazardous substances, scrap materials, and/or recyclable materials to this property.

Other than materials used in the fabrication of products at the facility and described in Response 2(d), there are no hazardous substances, scrap materials, and/or recyclable materials sold, transferred, delivered, or disposed of on the Properties. *See also* Responses 2(a) and (g) and associated documents.

f. Provide all information on electrical equipment used at the facility, including transformers or other electrical equipment that may have contained polychlorinated biphenyls (PCBs).

Containerboard Facility Property: A Seattle City Light transformer outside the East wall of the building supplies power to the facility. Seattle City Light installed this transformer in 2004. The transformer supplies 480 volt (AC), 3-phase, 2,000 amp power to the plant. This electric power is distributed through various distribution panels, wiring, and switchgear to the plant production equipment, plant lighting, and office lighting and equipment. The largest drives and motors used in the plant are (1) 220 HP – air compressor, (2) 150 HP – corrugator Pasers, (1) 125 HP – corrugator doublebacker, (3) 150 HP – #2400, #2600, and #2700 flexo folder gluers, and (1) 100 HP - #2300 flexo folder gluer.

See also Document numbers LFC001183 – LFC001207.

Warehouse Property: *See* Response 1(g).

g. Provide information on the type(s) of oils or fluids used for lubrication of machinery or other industrial purposes, and any other chemicals or products which are or may contain hazardous substances which are or were used at the facility for facility operations.

Containerboard Facility Property: Several lubricating oils and grease are used on the drive components of the equipment in the facility. Oils include EP 3 (30 weight), EP7 (70 weight), and EP9 (90 weight). Greases include Krytox (corrugator bearing grease) and Hy-Temp (100 degree) grease. *See also* Documents LFC001208 – LFC001651. *See also* Response 2(a) and (d) and associated documents.

Warehouse Property: *See* Response 1(g) and associated documents.

h. Provide any site drainage descriptions, plans or maps that include information about storm drainage which includes but is not limited to, above or below surface piping, ditches, catch basins, manholes, and treatment/detention or related structures including outfalls. If available, also include information about connections to sanitary sewer.

Containerboard Facility Property: There is an on-site wastewater treatment system. This is a Beckart treatment plant and is used to pre-treat wastewater from the process before it is discharged to Metro. This system includes flocculation and filtration of the water before discharge.

There are also two water permits. A King County Major Discharge Authorization #631-02, and an Industrial Stormwater general permit #S03-000206D. LFPPI was granted a Conditional No Exposure Certificate and permit no. S03-000206D was terminated by the Department of Ecology by letter dated 5/19/08.

See Document numbers LFC001652 – LFC001943; *see also* Response 2(a) and (d) and associated documents.

Warehouse Property: Notwithstanding the bathroom drains, there are no drains, catch basins, etc on the leased portion of the site. Drains and manholes exist in the parking lot and alongside the leased building (to capture roof runoff) and are controlled by the landlord.

i. With respect to past site activities, please provide copies of any stormwater or drainage studies, including data from sampling, conducted at these properties. Also provide copies of any Stormwater Pollution Prevention or Maintenance Plans or Spill Plans that may have been developed for different operations during the Respondent's occupation of the property.

Containerboard Facility Property: *See* Document numbers LFC001944 - LFC002962 *See also* Response 2(a) and associated documents.

Warehouse Property: As a mere tenant, LFPPI does not have any such documentation for this site.

3. Information About Others

a. Describe any business relationship you may have had regarding this property or operations thereon with the following entities:

- i. *Almonetto & Sons,*
- ii. *CLPF-Seattle Distribution Center, LP*
- iii. *D&J Property LLC,*
- iv. *Longview Fibre Paper & Packaging, Inc., and*
- v. *Schnitzer Investment Corp.*

The only business relationship with any of the entities listed above relate to (iv) and (v). As to the latter, Schnitzer Investment Corp. was the original landlord of the Warehouse Property. Respecting (iv), LFPPI was incorporated as a Washington corporation in October 2005. It was organized as a for-profit subsidiary of LFCo, a Washington corporation. LFCo contributed substantially all of its manufacturing operations (assets and liabilities) to LFPPI at the end of that year as part of LFCo's conversion to a timber REIT.

Thereafter, timber ownership and manufacturing were effectively separated under two boards and two rosters of officers, with overlap in senior and certain administrative positions. However, that changed a short time later when LFCo was acquired by Brookfield Asset Management, Inc. (an Ontario corporation traded on the Toronto and New York Stock Exchanges). The acquisition was closed in April 2007, and as part of corporate refinancing and restructuring for both the parent and subsidiary, LFCo and its timber related businesses were "transferred" and reorganized within a division of Brookfield's businesses dealing specifically with timber holdings. With respect to LFPPI, it initially received a new board (conforming to the new ownership) and, subsequently, refinancing and reorganization activity was undertaken in 2007 as part of relocating LFPPI to Brookfield's restructured assets division. This all culminated in a new board and all new shareholders, with a new, (largely) privately held majority group of shareholders on October 31, 2007.

At this time (and in approximate numbers), the shareholders of LFPPI and percentages are:

Tricap Partners II L.P., a Delaware limited partnership (equity held by outsiders) at 49.6%;
Tricap Partners II (PC) L.P. , a Delaware limited partnership (equity held by outsiders) at 5%;
Tricap Partners II (NR) L.P., a Delaware limited partnership (equity held by outsiders) at 5.95 % ;
Tricap Partners II (Bermuda) Ltd., a Bermuda corporation (jointly held by Brookfield and subsidiaries) at 39.45%;

The current LFPPI directors are:

Mark Brown

Gary Franko
Alexander Greene
Craig Laurie
Hugh Sutcliffe

Except for Craig Laurie, these individuals are not (nor have they been prior to the April acquisition) officers or directors of LFCo. Several of these individuals are employees or partners of either Brookfield or its affiliates, and therefore Brookfield does exercise a degree of control of LFPPI.

b. *Provide the names and last known address of any tenants or lessees, the dates of their tenancy and a brief description of the activities they conducted while operating on the above mentioned site including, but not limited to the following entities:*

- i. *Campbell Chain/Cooper Tools,*
- ii. *Food Buying Service,*
- iii. *FSI, a Division of MBI systems,*
- iv. *Fujitec America, Inc.,*

Previous occupier of 6703 East Marginal Way property. Neighboring tenant is now Ace Tank.

- v. *Hoa Ying Trading Corp.*
- vi. *Kasen Motorsports,*
- vii. *Rosella's Fruit & Produce,*

Existing tenant of property in the vicinity beyond no 6725 East Marginal Way.

- viii. *SCS Refrigerated Services, and*
- ix. *Summit Brokerage, Inc.*

c. *If not already provided, identify and provide a last known address or phone number for all persons, including Respondent's current and former employees or agents, other than attorneys, who have knowledge or information about the generation, use purchase, storage, disposal, placement, or other handling of hazardous materials at, or transportation of hazardous materials to or from, the Site.*

4. **Financial Information**

a. *Provide true and complete copies of all federal income tax documents, including all supporting schedules, for 2002, 2003, 2004, 2005, 2006 and 2007. Provide the federal Tax Identification Number and, if documentation is not available, explain why in detail,*

Copies of available federal income tax documents are attached. See Document

numbers LFC003153 – LFC003455.

b. Provide the Respondent's financial interest in, control of, or that the Respondent is a beneficiary of any assets (in the U.S. or in another country) that have not been identified in your federal tax returns or other financial information to be presented to EPA. If there are such assets, please identify each asset by type of asset, estimated value, and location.

LFPPI neither owns nor controls any subsidiaries or affiliates.

c. If Respondent is, or was at any time, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the full nature of each such corporate relationship, including but not limited to:

i. a general statement of the nature of relationship, indicating whether or not the affiliated entity had, or exercised, any degree of control over the daily operations or decision-making of the Respondent's business operations at the Site;

ii. the dates such relationship existed;

iii. the percentage of ownership of Respondent that is held by such other entity(ies);

iv. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities, as well as the names and addresses of each such affiliated entity's officers, directors, partners, trustees, beneficiaries, and/or shareholders owning more than five percent of that affiliated entity's stock;

v. provide any and all insurance policies for such affiliated entity(ies) which may possibly cover the liabilities of the Respondent at the Site, and

vi. provide any and all corporate financial information of such affiliated entities, including but not limited to total revenue or total sales, net income; depreciation, total assets and total current assets, total liabilities and total current liabilities, net working capital (or net current assets), and net worth.

LFPPI was a subsidiary of LFCo as described in its response to Item 3 from formation (in October 2005) through May 30, 2007. It is no longer owned or controlled by LFCo and has no direct, current accurate information concerning LFCo's current capital structure, corporate governance or insurance. However, because LFCo is affiliated with Brookfield Asset Management, Inc., the liability insurance policies provided above would, based upon the policy declaration, apparently would also cover LFCo.

Effective May 31, 2007 and through October 31, 2007 (the period mentioned above during which the financing and reorganization of the company occurred), LFPPI was wholly owned by Brascan (US) Corporation (a Delaware corporation). Brascan was also an affiliate of Brookfield. As stated, LFPPI is no longer owned or controlled by Brascan.

LFPPI has limited information about the finances of Brascan or any of its current shareholders other than to point out that Brookfield is publicly traded on the Toronto and New York Stock Exchanges, with information on that larger organization available from EDGAR.

For insurance information, see Response 5(a) and (b).

An unaudited balance sheet (with statement of shareholder's equity), together with an unaudited statement of operations, for the period from April 20, 2007 through October 31, 2007 is provided herewith.

An audited balance sheet as of December 31, 2007 (with statement of shareholder's equity), together with an audited statement of operations for the period from November 1, 2007 through December 31, 2007 is provided herewith. LFPPI is no longer publicly traded and its financial information is confidential and a business confidentiality claim is being asserted over the entire contents of this documentation. See Document numbers LFC003456 – LFC003465.

5. **Insurance Coverage**

a. Provide copies of all property, casualty and/or liability insurance policies, and any other insurance contracts referencing the site or facility and/or Respondent's business operations (including, but not limited to, Comprehensive General Liability, Environmental Impairment Liability, Pollution Legal Liability, Cleanup Cost Cap or Stop Loss Policies). Include, without limitation, all primary, excess, and umbrella policies which could be applicable to costs of environmental investigation and/or cleanup, and include the years such policies were in effect.

Current policies in the LFPPI's possession are provided herewith, See Document numbers LFC002963 – LFC 003091.

LFPPI will provide copies of historical policies if EPA so requests after reviewing this response, but the policies are voluminous, and will need to be retrieved from archives, catalogued and photocopied. Undertaking these tasks could not be accomplished in the timeframe provided by this request.

b. If there are any such policies from question "5a" above which existed, but for which copies are not available, identify each such policy by providing as much of the following information as possible:

- i. the name and address of each insurer and of the insured;*
- ii. the type of policy and policy numbers;*
- iii. the per occurrence policy limits of each policy; and*
- iv. the effective dates for each policy.*

A list of General and Excess archived policies in the possession of the

LFPPI are provided herewith.

A list of archived fire insurance policies in the possession of the LFPPI are provided herewith.

A list of Umbrella/Excess Liability Policies dating 2008 to 2009, and 2007 to 2008 are provided herewith.

See Document numbers LFC003092 – LFC003100

c Identify all insurance brokers or agents who placed insurance for the Respondent at any time during the period being investigated, as identified at the beginning of this request, and identify the time period during which such broker or agent acted in this regard.

Brokers are and have been: Torrence Martin Insurance, Longview WA, followed by Bratrud Middleton Insurance, Tacoma WA and, currently, RiskCorp Inc., London Ontario (Canada).

d Identify all communication and provide all documents that evidence, refer, or relate to claims made by or on behalf of the Respondent under any insurance policy in connection with the site. Include any responses from the insurer with respect to any claims.

Because non-environmental insurance claims are not relevant to EPA's Request for Information, LFPPI declines to identify such claims respecting the Seattle plant or its operations. Except for notification of the Request for Information to which this response is provided, (which has been the subject of a letter to LFPPI's former liability carrier), no notice of environmental claims have been made.

e Identify any previous settlements with any insurer in connection with the site, or for any claims for environmental liabilities during the time period under investigation. Include any policies surrendered or cancelled by the Respondent or insurer.

See Response 5(d).

f. Identify any and all insurance, accounts paid or accounting files that identify Respondent's insurance policies.

Accounts payable records and excess insurance policy reference insurance policies.

g. Identify Respondent's policy with respect to document retention.

LFPPI is currently revising this document retention policy. A copy of the outdated policy is attached. See Document numbers LFC003101-LFC003152.

6. Compliance with This Request.

a. Describe all sources reviewed or consulted in responding to this request, including, but not limited to:

i. *the name and current job title of all individuals consulted;*

David N. Mendenhall, Senior Water Quality Engineer

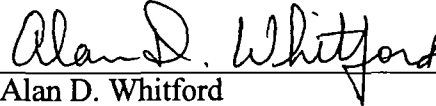
ii. *the location where all documents reviewed are currently kept.*

Environmental Services Department, Longview Fibre Paper and
Packaging, Inc., 300 Fibre Way, Longview, WA, 98632

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent and that the foregoing is complete, true, and correct.

Executed on June 11, 2008.



Alan D. Whitford
Environmental Services Manager

Mailing address:

Longview Fibre Paper and Packaging, Inc.
P.O. Box 639-300
300 Fibre Way
Longview, WA 98632